

Thomas Wesley Mooney
Provence, Tiffany N v. United States of America, et al

December 15, 2021

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1 UNITED STATES DISTRICT COURT
2 DISTRICT OF SOUTH CAROLINA
3 CHARLESTON DIVISION
4 IN ADMIRALTY

5 TIFFANY N. PROVENCE, AS THE PERSONAL
6 REPRESENTATIVE OF THE ESTATE OF JUAN
7 ANTONIO VILLALOBOS HERNANDEZ,

8 Plaintiff,

9 vs. CASE NO. 2:21-cv-965-RMG

10 UNITED STATES OF AMERICA, CROWLEY
11 MARITIME CORPORATION, CROWLEY GOVERNMENT
12 SERVICES, INC., DETYENS SHIPYARDS, INC.,
13 AND HIGHTRAK STAFFING, INC. D/B/A HITRAK
14 STAFFING, INC.,

15 Defendants.

16 DEPOSITION OF: THOMAS WESLEY MOONEY
17 DATE: December 15, 2021
18 TIME: 9:04 a.m.
19 LOCATION: DETYENS SHIPYARDS, INC.
20 1670 Dry Dock Avenue
21 Suite 200
22 North Charleston, SC

23 TAKEN BY: Counsel for the Plaintiff

24 REPORTED BY: MICHAEL DAVID ROBERTS,
25 Court Reporter

1 What about -- do you know anything
2 about Hitrak Staffing?

3 A. I know that they have employees that
4 work here, yes, sir.

5 Q. Okay. Did they clock in at the
6 Detyens' stations, too?

7 A. Yes, sir.

8 Q. Okay. So there's not a separate Hitrak
9 clock in?

10 A. No, sir.

11 Q. All right. And then as far as
12 temporary employees or permanent employees, is
13 there any distinction between folks like you that
14 work for Detyens and folks that work for Hitrak?

15 A. No, sir.

16 Q. They're all the same?

17 A. Yes, sir.

18 Q. All right. And so what is your
19 understanding of what kind of Hitrak Staffing does
20 for Detyens?

21 A. All I know is they provide people when
22 we -- when we need them.

23 Q. Okay. So have you ever made a request
24 to Hitrak Staffing for personnel?

25 A. No, sir.